

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,  
*ex rel.* GORDON F.B. ONDIS

Plaintiff,

vs.

CITY OF WOONSOCKET, RHODE  
ISLAND; SUSAN D. MENARD, in  
her individual capacity and in her  
capacity as Mayor of the City of  
Woonsocket, Rhode Island; JOEL D.  
MATHEWS, in his individual  
capacity and in his capacity as Director  
of Planning and Community Devel-  
opment of the City of Woonsocket, Rhode  
Island; PAULETTE MILLER, in her  
individual capacity and in her capacity  
as Assistant Director of Planning and  
Community Development of the City of  
Woonsocket, Rhode Island; OWEN T.  
BEBEAU, in his individual capacity  
and in his capacity as Director of  
Human Services of the City of  
Woonsocket, Rhode Island; and  
MICHAEL ANNARUMMO, in his  
individual capacity and in his capacity  
as Director of Administration and Director  
of Public Works of the City of Woonsocket,  
Rhode Island;

Defendants.

CIVIL NO. 05-10312-MLW

**RELATOR'S OBJECTION TO DEFENDANTS' MOTION FOR LEAVE TO  
FILE REPLY MEMORANDUM**

Relator herewith makes his objection to Defendants' Motion for Leave to  
File Reply Memorandum.

In support of such objection Relator states that the issues raised by Defendants in their Motion to Dismiss and accompanying Memorandum of Law have been fully briefed by the parties. Moreover, all parties have requested oral argument. Any outstanding matters may be addressed at that time if the Court allows such argument.

However, if the Court grants Defendants' motion Relator requests leave to file a sur-reply after the same twenty (20) day period enjoyed by Defendants to prepare their Reply. Such request is embodied in a separate motion filed concurrently herewith.

Respectfully Submitted,

**Government of the United States  
*ex rel.* Gordon F.B. Ondis**

BY HIS ATTORNEY

/s/ Leon A. Blais

---

Leon A. Blais (BBO#652595)

BLAIS PARENT & QUINN  
20 Cabot Blvd  
Suite 300  
Mansfield, MA 02048  
508 618-1280  
617 812-0459 fax  
[LBlais@BlaisParent.com](mailto:LBlais@BlaisParent.com)

**Certificate of Service**

The undersigned counsel hereby certifies that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. All counsel of records are such registered participants.

Dated: June 23, 2006

/s/ Leon A. Blais